



**Staci L. Pies**

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**Ex Parte – via Electronic Filing**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: CC Docket No. 01-92; WC Dockets No. 02-361 and 03-45

On August 7, 2003, Mike Romano and I, of Level 3 Communications met with Jane Jackson, Associate Chief, Wireline Competition Bureau, Tamara Preiss, Division Chief, and Christopher Barnekov of the Pricing Policy Division. During the meeting, Level 3 discussed issues relating to foreign exchange and foreign exchange-like services, the appropriate regulatory treatment of voice over Internet protocol (VoIP) applications and the need for comprehensive intercarrier compensation reform as detailed in the included attachments. Level 3 reiterated the positions taken in its comments in the above-referenced proceedings that FX-type arrangements (including traditional FX services) are a legitimate and necessary response to customer demands and emphasized that the ILEC's financial and network responsibilities do not differ in *any* respect based upon the location of the CLEC customer. Moreover, we urged the Commission to confirm that VoIP traffic is not currently subject to the interstate access charges applicable to circuit-switched traffic and advocated swift resolution of these and related issues in the context of comprehensive intercarrier compensation reform.

Sincerely,  
/s/ submitted electronically  
Staci L. Pies  
Director, Federal Regulatory Affairs